

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY) CIVIL ACTION NO.
LITIGATION (NO. VI)) MDL 875

This Document relates to: ALL FELA ACTIONS IN)
WHICH GRIFFIN WHEEL COMPANY IS A)
DEFENDANT)

PLAINTIFFS' INTERROGATORIES TO GRIFFIN WHEEL COMPANY

1. When was the first date that you were required to comply with any regulation concerning the use of asbestos on any brakeshoes you manufactured?

ANSWER:

2. Fully set forth the regulation identified in Interrogatory one.

ANSWER:

3. Identify any regulation that you contend concerns the use of asbestos on any brakeshoes that you ever manufactured?

ANSWER:

4. If you contend that any federal regulation concerning brakeshoes ever required or prohibited the use of asbestos, identify all such regulations.

ANSWER:

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5. If you contend that any federal regulation concerning brakeshoes ever mentioned asbestos, identify all such regulations.

ANSWER:

6. Identify any brakeshoes that you ever manufactured for which you submitted for approval to any federal agency a design or specification for the use of asbestos?

ANSWER:

7. Has any federal agency ever inspected any Griffin Wheel Company ("GW") brakeshoes for the purpose of determining whether asbestos had been utilized? If so, list all brakeshoes that have been subjected to any such inspection.

ANSWER:

8. Identify your most knowledgeable person with respect to the regulation of your brakeshoes by any federal agency, including but not limited to the regulation, if any, of the use of asbestos.

ANSWER:

9. Has GW ever sold a brakeshoe with a warranty, express or implied? If so, has GW ever refuted such a warranty based upon preemption by the Boiler Inspection Act? Describe each instance.

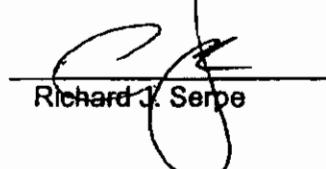
ANSWER:

10. Has GW purchased brakeshoe components or materials under warranty, express or implied? If so, has GW ever claimed that a component or material was in breach of such warranty? Describe each instance.

ANSWER:

Respectfully submitted,

GLASSER AND GLASSER, P.L.C.



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PLAINTIFFS' REQUESTS FOR PRODUCTION TO GRIFFIN WHEEL COMPANY

1. Produce any regulations identified in Plaintiffs' Interrogatories to Griffin Wheel Company Numbers 1 to 5.

RESPONSE:

2. Produce any document reflecting your interactions with any federal agency identified in Plaintiffs' Interrogatories to Griffin Wheel Company Numbers 6 and 7.

RESPONSE:

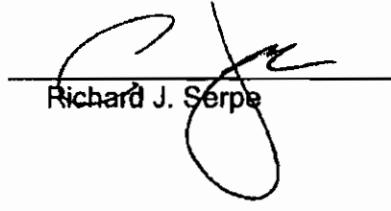
3. Produce any document reflecting preemption of warranty claims identified in Plaintiffs' Interrogatories to Griffin Wheel Company Numbers 10 and 11.

RESPONSE:

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Respectfully submitted,

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